

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED PARCEL SERVICE, INC.,	:	
	:	Civil Action No.
Plaintiff,	:	1:12-cv-07961-SAS
	:	
-against-	:	NOTICE OF MOTION FOR
	:	JUDGMENT ON THE
LEXINGTON INSURANCE COMPANY,	:	PLEADINGS, OR TO STAY THE
	:	LITIGATION AND COMPEL
Defendant.	:	ARBITRATION
-----X		<u>ORAL ARGUMENT REQUESTED</u>

PLEASE TAKE NOTICE that, upon the accompanying Declaration of J. Gregory Lahr dated February 15, 2013, and attached exhibits, the accompanying Memorandum of Law dated February 15, 2013, and upon all pleadings and prior proceedings heretofore had herein, Defendant Lexington Insurance Company, by its attorneys, Sedgwick LLP, will move this Court at a date and time designated by the Court, before the Honorable Shira A. Scheindlin at 500 Pearl Street, New York, New York 10007, for an Order, pursuant to Rule 12(c) of the Federal Rules of Civil Procedure, dismissing the Complaint or, alternatively, staying the litigation and compelling Plaintiff to arbitrate its claims against Defendant pursuant to the binding arbitration provision in the subject insurance policy, and for such other and further relief as the Court deems just and proper.

Dated: New York, New York
February 15, 2013

Respectfully submitted,

SEDGWICK LLP

/s/ J. Gregory Lahr

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